

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

RAVIDATH LAWRENCE RAGBIR et al.,

Plaintiffs,

v.

THOMAS D. HOMAN et al.,

Defendants.

Civil Action No. 18 Civ. 1159

**PLAINTIFFS' NOTICE OF MOTION
FOR A PRELIMINARY INJUNCTION**

PLEASE TAKE NOTICE that upon the Verified Complaint sworn to on February 7, 2018, the concurrently filed Memorandum of Law in Support of Plaintiffs' Motion for a Preliminary Injunction, the Declaration of George Escobar, dated February 12, 2018, the Declaration of Steve Choi, dated February 12, 2018, the Declaration of Mary Small, dated February 12, 2018, and the Declaration of Dan Kesselbrenner, dated February 11, 2018, the Declaration of Alina Das, dated February 12, 2018, and the Declaration of Matthew L. Hoppock, dated December 27, 2017, Plaintiffs, by and through their attorneys, will move before the United States District Court for the Southern District of New York, for an Order, pursuant to Rule 65 of the Federal Rules of Civil Procedure, granting Plaintiffs a preliminary injunction. In particular, Plaintiffs seek a preliminary injunction (1) staying Plaintiff Ravidath Ragbir's removal from the United States and (2) restraining Defendants from taking any adverse immigration enforcement action against any noncitizen on the basis of protected speech or expressive conduct. In the alternative to (2), Plaintiffs seek a preliminary injunction restraining Defendants from opening an investigation into, surveilling, accelerating proceedings against, detaining, or altering the provisions of any order against any noncitizen on the basis of protected speech or expressive conduct.

Dated: February 12, 2018

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Respectfully submitted,

/s/ Anthony D. Boccanfuso

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* Pro hac vice application forthcoming

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AFFIRMATION OF SERVICE

I, Anthony D. Boccanfuso, the undersigned attorney at law duly admitted to practice in the State of New York, respectfully show that on the 12th day of February, 2018, I caused a copy of the attached to be served by email, by agreement of the parties, upon:

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/s/ Anthony D. Boccanfuso

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